

William H. Schwarzschild, III - VSB No. 15274
WILLIAMS, MULLEN
Two James Center, 16th Floor
1021 East Cary Street
Post Office Box 1320
Richmond, Virginia 23218-1320
Phone: 804.783.6489
FAX: 804.783.6507
tschwarz@williamsmullen.com

Counsel for Dollar Tree Stores, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

-----X	:	
	:	
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <i>et al.</i> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

MOTION FOR ADMISSION *PRO HAC VICE* OF SCOTT R. KIPNIS

William H. Schwarzschild, III (the “Movant”), a member in good standing of the bar of the Commonwealth of Virginia, a shareholder with the law firm Williams Mullen and an attorney admitted to practice before this Court, hereby moves this Court for entry of an Order permitting Scott R. Kipnis, an attorney with the law firm Hofheimer Gartlir & Gross, LLP, to appear *pro hac vice* before this Court on behalf of Dollar Tree Stores, Inc. (“Dollar Tree”) pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support thereof, Movant states as follows:

1. Scott R. Kipnis is a non-resident of the Eastern District of Virginia, is a member in good standing of the bars of the State of New York, New Jersey, and Pennsylvania, admitted to practice before the United States District Court for the Southern and Eastern Districts of New York, the District of New Jersey, and the Eastern District of Pennsylvania, the United States Court of Appeals for the Second, Third, and Fifth Circuits, and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. Kipnis.

2. Movant requests that this Court admit Scott R. Kipnis to practice before this Court for the purpose of appearing as counsel in the jointly administered Chapter 11 bankruptcy cases commenced by Circuit City Stores, Inc., *et al.* (the “Debtors”).

3. Movant and his law firm shall serve as co-counsel with Mr. Kipnis in the bankruptcy case and related proceedings.

4. A copy of this motion has been served upon counsel for the Debtors, counsel for the Official Committee of Unsecured Creditors, and the Office of the United States Trustee for the Eastern District of Virginia.

5. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this motion, Movant requests waiver of the requirement that all motions be accompanied by written memoranda of law.

6. Pursuant to Local Bankruptcy Rule 9013-1(L), and because this motion does not present contested issues, Movant requests that the Court rule upon the motion without an oral hearing.

WHEREFORE, Movant respectfully requests that this Court enter an Order substantially in the form annexed hereto permitting Scott R. Kipnis to appear and be heard *pro hac vice* in association with Movant, as counsel to Dollar Tree, in the Debtors’ chapter 11 bankruptcy cases and grant such other relief as necessary and appropriate.

Dated: Richmond, Virginia
November 24, 2008

WILLIAMS MULLEN

/s/ William H. Schwarzschild, III

By: _____

William H. Schwarzschild, III - VSB No. 15274

WILLIAMS, MULLEN

Two James Center, 16th Floor

1021 East Cary Street

Post Office Box 1320

Richmond, Virginia 23218-1320

Phone: 804.783.6489

FAX: 804.783.6507

tschwarz@williamsmullen.com

Counsel for Dollar Tree Stores, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have, this 24th day of November 2008 caused the service of a copy of the foregoing Motion for Admission *Pro Hac Vice* of Scott R. Kipnis to be sent to those on the annexed Service List, by first class mail, postage prepaid, at the address designated by them for service of papers and electronically to the parties set forth on the Court's ECF Service List, in this case.

/s/ William H. Schwarzschild, III

SERVICE LIST

Daniel F. Blanks, Esq.
Douglas M. Foley, Esq.
McGuire Woods LLP
Proposed Counsel for the Debtors
9000 World Trade Center
101 W. Main Street
Norfolk, Virginia 23510

Dion W. Hayes, Esq.
Joseph S. Sheerin, Esq.
Sarah Becket Boehm, Esq.
McGuire Woods LLP
Proposed Counsel for the Debtors
One James Center
901 East Cary Street
Richmond, Virginia 23219

Greg M. Galardi, Esq.
Ian S. Fredericks, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
Proposed Counsel for the Debtors
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636

Chris L. Dickerson, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
Proposed Counsel for the Debtors
333 West Wacker Drive
Chicago, Illinois 60606

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
Tavenner & Beran, PLC
Proposed Counsel for the Official Committee of Unsecured Creditors
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

Jeffrey N. Pomerantz, Esq.
Pachulski Stang Ziehl & Jones LLP
Proposed Counsel for the Official Committee of Unsecured Creditors
10100 Santa Monica Boulevard, 11th Floor
Los Angeles, CA 90067-4100

Robert J. Feinstein, Esq.
Pachulski Stang Ziehl & Jones LLP
Proposed Counsel for the Official Committee of Unsecured Creditors
780 Third Avenue, 36th Floor
New York, New York 10017-2024

Robert B. Van Arsdale, Esq.
Office of the U. S. Trustee
701 E. Broad St., Suite 4304
Richmond, Virginia 23219

1686318v1